

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**FILED/ACCEPTED**

**OCT 18 2010**

Federal Communications Commission  
Office of the Secretary

In the Matter of	)
	)
<b>F&amp;B Communications, Inc.</b>	) WC Docket No. 08-71
<b>f/k/a Farmers' and Business Men's</b>	)
<b>Telephone Company</b>	)
	)
<b>Petition for Waiver of Section 54.802(a)</b>	)
<b>of the Commission's Rules</b>	)

**PETITION FOR WAIVER OF SECTION 54.802(a)**

Pursuant to Section 1.3 of the Commission's rules, 47 C.F.R. § 1.3, F&B Communications, Inc. f/k/a Farmers' and Business Men's Telephone Company (the "**Company**"; USAC Service Provider Identification Number: 143028094), by counsel, respectfully requests a waiver of the June 30, 2010 deadline to submit quarterly line count data used to calculate Interstate Access Support ("**IAS**"), as set forth in section 54.802(a) of the Commission's rules. In support of its petition, the Company states as follows:

**1. BACKGROUND AND INTRODUCTION.**

Pursuant to section 54.802(a) of the Commission rules, in order to receive Interstate Access Support, a competitive eligible telecommunications carrier ("**ETC**") must submit to USAC the number of lines served by the competitive ETC in a given service area according to a specific schedule. Competitive ETCs must submit data no later than June 30 for the quarterly line count as of March 31 of the same year.

No. of Copies rec'd 041  
List A B C D E

The Company is a small competitive local exchange carrier serving approximately 826 CLEC access lines, as of September 1, 2010, in eastern Iowa (study area code: 359007). The June 30, 2010 filing was only the second IAS quarterly filing prepared and filed by the Company's staff. Previously, a consulting company prepared the filings on behalf of the Company. The Company is a small, rural carrier with very limited staff. Consequently, the Company's office manager was the only employee responsible for preparing and filing the IAS report.<sup>1</sup> The office manager and the Company's general manager were out of town at a USDA/RUS Broadband Initiatives Program Post Award Workshop the week before the filing was due. The employee responsible for the filing added the quarterly IAS filing to the Company's list of quarterly reports. However, due to the fact that all of the Company's other quarterly reports are prepared by the end of July, and the absence of two key staff members just prior to the end of the quarter, the June 30 IAS quarterly filing was inadvertently overlooked. The responsible employee attempted to file the IAS report electronically as soon as she realized the missed deadline, on July 12, 2010. She was unable to submit the filing electronically because the deadline had passed, so she sent the quarterly filing via email to USAC on July 13, 2010. A true and correct copy of the Company's email accurately reflecting the transmission date and time and including the attached filings sent to USAC on July 13, 2010 is attached hereto as **Exhibit B**. As a result, the Company attempted to file the IAS quarterly report electronically seven business days late, and USAC received the filings by email eight business days late. The Company has never previously missed a USAC filing deadline.

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<sup>1</sup> See Exhibit A to Petition, Declaration of Julie Steines.

## 2. DISCUSSION.

The Commission's rules may be waived for good cause shown and "where the particular facts make strict compliance inconsistent with the public interest."<sup>2</sup> The Commission has made clear in several decisions over the past few years that good cause exists and the public interest is advanced where ETCs (1) have filed the required data only days after the filing deadline, (2) have taken steps to ensure future compliance and (3) will otherwise lose funding that could negatively impact universal service programs.<sup>3</sup> Each of those circumstances is present here.

### A. The Company Submitted the Filings Within Days of the Deadline.

The Commission has routinely granted petitions to waive quarterly filing deadlines where an ETC has inadvertently missed the deadline by a matter of days. In a recent order, the Commission granted the waivers of several petitioners who made required USAC filings between one and fourteen business days after the deadlines.<sup>4</sup> The Commission found that by submitting the filing less than fourteen business days after the filing deadline, "the petitioners promptly remedied their errors."<sup>5</sup> The Company attempted to submit its filing seven business days after the deadline and emailed the filing to USAC eight business days after the deadline. The Company discovered the missed

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<sup>2</sup> 47 C.F.R. § 1.3; *Verizon Communications Inc. Petition for Waiver of Section 54.802(a) of the Commission's Rules*, Order, CC Docket No. 96-45, 21 FCC Rcd 10155, 10156-57 ¶ 6 (2006) ("*Verizon Order*").

<sup>3</sup> See *Verizon Order*; *Xfone USA, Inc. Petition for Waiver of Sections 54.307(c) and 54.802(a) of the Commission's Rules*, Order, WC Docket No. 08-71, 24 FCC Rcd 4813 (2009); *AT&T Communications of NY and AT&T Communications of California Petition for Waiver of Section 54.802(a) of the Commission's Rules*, Order, CC Docket No. 96-45, 22 FCC Rcd 953 (2007) ("*AT&T Order*"); *NPCR, Inc. Petition for Waiver of Sections 54.802(a) of the Commission's Rules*, Order, CC Docket No. 96-45, 22 FCC Rcd 560 (2007) ("*NPCR Order*").

<sup>4</sup> *In re Petitions for Waiver of Universal Service High-Cost Filing Deadlines et al.*, Order, WC Docket No. 08-71, CC Docket No. 96-45, 25 FCC Rcd 843, 854-855 ¶ 22 (2010).

<sup>5</sup> *Id.*

deadline and submitted the filing well within the amount of time the Commission has previously found to justify granting a waiver.

**B. The Company Has Taken Steps to Ensure Future Compliance.**

The Commission has also looked favorably on requests for waivers of filing deadlines where an ETC has taken steps to eliminate future data submission deadline errors.<sup>6</sup> The Company has committed to revise its internal procedures to ensure compliance with all future filing deadlines. First, the Company implemented a new procedure in which two persons, including the Company's general manager, are now responsible to verify that the quarterly reports are completed and submitted to USAC in a timely manner. Previously, only one person was responsible for filing the reports. Second, the Company has scheduled automated calendar reminders to provide early notice of upcoming deadlines to personnel responsible for filing. Finally, the Company will assign internal deadlines for gathering information and preparing filing materials to ensure preparation and submission of filings in advance of the filing deadline. When considering similar commitments to ensure compliance, the Commission has previously found that "strict enforcement of the filing deadline would disproportionately penalize [the ETC] when considered in light of its actions to remedy its error."<sup>7</sup>

**C. Granting the Requested Waiver is in the Public Interest Because the Company Will Otherwise Lose Funding That Could Negatively Impact Universal Service Programs.**

Finally, the Commission has recognized that where quarterly line count data have been filed only days late and corrective measures have been implemented, denying the waiver would "undermine [an ETC's] investments in its network, and thus its ability to

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<sup>6</sup> *AT&T Order*, 22 FCC Rcd at 955-56 ¶ 9; *NPCR Order*, 22 FCC Rcd at 563 ¶ 9; *Verizon Order*, 21 FCC Rcd at 10158 ¶ 10.

ensure that customers have and maintain access to adequate services."<sup>8</sup> The Commission has determined that IAS support is critical to ensuring that consumers in all areas have access to affordable telecommunications services and that local exchange carriers can invest in their networks in the face of dramatically lower access charges.<sup>9</sup> Grant of a waiver of Commission rules is necessary, in this instance, to prevent the Company from being adversely affected.

The Company is a small business, operating in a rural eastern Iowa service area, and the universal service support it receives constitutes a significant portion of its capital and operating budget for the rural area it serves. Receipt of universal service support, and IAS funding in particular, is critical to the Company's mission of providing affordable, high-quality telecommunications services to its subscribers and future subscribers in this high-cost area. Denying a waiver in this circumstance would be contrary to the public interest because requiring the Company to forego support for which it qualifies would cause the Company a significant financial hardship that would detrimentally affect its provision of service in rural Iowa. If the instant waiver is not granted, the Company will not only lose its third quarter IAS support, but it will also be required to repay most of its second quarter IAS support. This is the Company's first failure to meet a USAC filing deadline, and strict enforcement of the filing deadline in this case would disproportionately disadvantage the Company and, consequently, harm the very consumers intended to benefit from the federal universal service program.

In addition to offering universal service to consumers in rural Iowa, the Company is also actively working to build out its network in its rural service area. The Company

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<sup>7</sup> *AT&T Order*, 22 FCC Rcd at 955 ¶ 6.

<sup>8</sup> *Verizon Order*, 21 FCC Rcd at 10157 ¶ 8.

has plans to construct new facilities in its service area, including a plan to construct a broadband infrastructure project to serve areas that are at least 75% rural, which is financed in part by the Broadband Initiative Program. Uninterrupted IAS support is crucial to enable the Company both to provide universal service to underserved rural areas and to enable the Company to construct and upgrade networks in its high-cost rural areas. Future projects to construct and improve the Company's infrastructure may be jeopardized if IAS funding is not provided. While the Company has invested millions of dollars to bring telecommunications services to its customers in rural areas, it could not do so without IAS support. Consumers in rural Iowa who are expecting continued and rapid deployment of facilities would therefore be harmed by the denial of the requested waiver.

The requested waiver will not cause any hardship for USAC or other universal service fund recipients because the amount of universal service fund support received by the Company is very small compared to the overall size of the universal service fund, and USAC received the filings via email only eight business days after the deadline. Accordingly, the Commission's grant of the Company's requested waiver would enable the Company to continue to receive IAS support and to further the goals of universal service and serve the public interest. No other party will be prejudiced by a grant of this waiver request and consumers in rural Iowa who are expecting continued telecommunications services would be harmed by its denial. USAC will not be prejudiced by the late filings, which were received only eight business days after the deadline.

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<sup>9</sup> *Verizon Order*, 21 FCC Rcd at 10157 ¶ 8.

### **Conclusion**

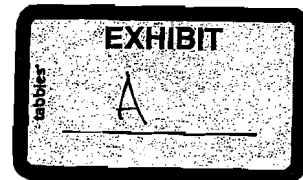
For the foregoing reasons, the Company respectfully requests that the Commission promptly grant its petition for a waiver of section 54.802(a) and direct USAC to accept the Company's quarterly interstate access support submission for the quarter ending June 30, 2010.

Respectfully submitted,

Kenneth Laursen, General Manager  
F&B Communications, Inc. f/k/a Farmers'  
and Business Men's Telephone Company  
103 Main Street North  
P.O. Box 309  
Wheatland, Iowa 52777-0309  
Telephone: (563) 374-1236  
Facsimile: (563) 374-1940  
Email: [laursen@fbc.bz](mailto:laursen@fbc.bz)

/s/ John C. Pietila  
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Telephone: (515) 288-2500  
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Email: [JohnPietila@davisbrownlaw.com](mailto:JohnPietila@davisbrownlaw.com)  
  
*Attorneys for F&B Communications, Inc.*

October 13, 2010



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
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<b>F&amp;B Communications, Inc.</b>	)	WC Docket No. 08-71
<b>f/k/a Farmers' and Business Men's</b>	)	
<b>Telephone Company</b>	)	
	)	
<b>Petition for Waiver of Section 54.802(a)</b>	)	
<b>of the Commission's Rules</b>	)	

**DECLARATION OF JULIE STEINES**

1. My name is Julie Steines. My business address is 103 Main Street, P.O. Box 309, Wheatland, Iowa 52777-0309. I am the office manager of F&B Communications, Inc. f/k/a Farmers' and Business Men's Telephone Company. The statements in this declaration are based on my personal knowledge.

2. I am responsible for preparing and filing the IAS quarterly line count data. I have held this responsibility since the quarterly filing due March 31, 2010. Prior to that time, the Company's consultant prepared IAS filings on behalf of the Company.

3. The Company takes very seriously its responsibility to file its quarterly line counts with USAC in a timely fashion and appreciates the large amounts of data that USAC routinely processes. Prior to the June 30, 2010 quarterly filing, the Company has never failed to meet a USAC filing deadline.

4. The Company for the first time missed a USAC filing deadline when the Company failed to file its quarterly IAS line counts by June 30, 2010. This oversight was due in part to the absence of key Company staff members the week before the filing was due and the fact that the June 30, 2010 filing was only the second IAS quarterly filing



that I prepared and filed. The Company is a small, rural carrier with very limited staff, so consequently I was the only employee responsible for preparing and filing the IAS report. The week prior to the IAS filing deadline, the Company's general manager and I were both out of town at a USDA/RUS Broadband Initiatives Program Post Award Workshop. I prepare all the quarterly tax filing reports for the Company, which are prepared and submitted the month following the end of the quarter. I added the quarterly IAS filing to the Company's list of quarterly reports; however, all of the Company's other quarterly reports are prepared by the end of July. Due to this fact and the backlog caused by the absence of two key office staff members at the end of the quarter, I inadvertently overlooked the June 30 IAS quarterly filing deadline.

5. As soon as I realized the missed deadline, on July 12, 2010, I attempted to file the IAS report electronically. I was unable to submit the filing electronically because the deadline had passed, so I sent the quarterly filing via email to USAC on July 13, 2010.

6. The Company has taken steps to ensure quarterly line count filings and other filings are made in a timely manner in the future. First, the Company has implemented a new procedure in which two persons, the Company's general manager and I, are now responsible to verify that the quarterly reports are completed and submitted to USAC in a timely manner. Second, the Company has scheduled automated calendar reminders to provide early notice of upcoming deadlines to both the general manager and me. Finally, the Company will assign internal deadlines for gathering information and preparing filing materials to ensure preparation and submission of filings in advance of

the filing deadline. With these measures in place, the Company is confident that filings will continue to be made in a timely manner in the future.

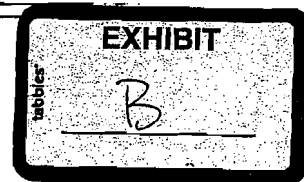
7. This concludes my Declaration.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge, information and belief.

Executed on October 8, 2010.

Julie Steines  
Julie Steines

**From:** Julie Steines  
**Sent:** Tuesday, July 13, 2010 10:29 AM  
**To:** 'hcfilings@hcli.universalservice.org'  
**Cc:** Kenneth Laursen  
**Subject:** FCC Form 525



Please find attached our FCC Form 525, Certification, and letter of explanation.

Thank you  
Julie

Julie Steines  
Office Manager  
F&B Communications, Inc.  
103 Main St N, P.O. Box 309  
Wheatland, Iowa 52777-0309  
Phone 563.374.1236  
Fax 563.374.1930

FCC Form 525  
High Cost Support Mechanism  
Competitive Carrier Line Count Report

FCC Form 525  
OMB Control No. 3060-0986  
June 2005

**COMPETITIVE CARRIER HIGH COST DATA SUBMISSION**

(1) Quarterly Submission Date: 6/30/2010

(2) USAC Service Provider Identification Number (SPIN): 143028094

(3) Company Study Area Code: (First time filers leave blank and a Study Area Code will be assigned) 359007

(4) Study Area Name: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.  
(5) Company Legal Name: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.  
(6) Filer 499 ID: 811438

Check Box if this is a new address/contact from a previous data submission: ☐

(7) Mailing Address: 103 Main Street North, P.O. Box 309, Wheatland, IA 52777-0309  
(8) Contact Name: Ken Laursen (9) Title: General Manager  
(10) Telephone Number: 563-374-1236  
(11) E-mail Address: mail@fbc.bz

Do Not Write in this Area:  
For Administrator's Use Only

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing		(15) Worksheet to Complete
		Original	Revision	
High Cost Loop Support (HCL)				Complete HCL and LSS
Local Switching Support (LSS)				Complete HCL and LSS
Interstate Common Line Support (ICLS)				Complete ICLS Worksheet
High Cost Model Support (HCM)				Complete HCM Worksheet
Interstate Access Support (IAS)	3/31/2010	X		Complete IAS Worksheet

[illegible]

## INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

[illegible]

**Use an additional sheet if necessary.**

[illegible]

Page 4

[illegible]

Page 5



UNBUNDLED NETWORK ELEMENTS REPORTING

(2) USAC Service Provider Identification Number (SPIN):	143028094	Do Not Write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	359007	
(4) Study Area Name:	F&B Communications, Inc. M/A Farmers' and BusinessMen's Tel. Co.	

Complete one worksheet for each study area of a Path 1 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service, the UNE switching price per minute and number of switching minutes.

(51) Incumbent Carrier Name:	
(52) Incumbent Carrier Study Area Code:	

Please provide the following information for Path 1 Rural Incumbent Carrier Study Areas:

(53) UNE Zone	Loop w/o port cost		Ports		Vertical Services		Switching		
	(54) No. of Loops	(55) Price per loop	(56) No. of ports	(57) Price/port	(58) No. of loops w/ Vertical Services	(59) Price for vertical services on each loop	(60) No. of loops with switching	(61) No. of switching minutes	(62) Price/minute
Zone 1									
Zone 2									
Zone 3									
Zone 4									
Zone 5									

Complete one worksheet for each study area of a Path 2 or Path 3 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. For each incumbent study area, list the name of each disaggregation zone. If the disaggregation zone includes more than one UNE zone, please report the lines in each UNE zone per disaggregation zone on a separate row. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service, the UNE switching price per minute and number of switching minutes.

Please provide the following information for Path 2 and Path 3 rural incumbent carrier study areas:

(63) UNE Zone Name	(64) Disaggregation Zone Name	(65) UNE type	(66) Quantity	(67) Price	(68) Minutes
		Loops without port costs			
		Ports			
		No. of loops w/ Vertical Services			
		No. of loops w/ switching			
		Loops without port costs			
		Ports			
		No. of loops w/ Vertical Services			
		No. of loops w/ switching			
		Loops without port costs			
		Ports			
		No. of loops w/ Vertical Services			
		No. of loops w/ switching			
		Loops without port costs			
		Ports			
		No. of loops w/ Vertical Services			
		No. of loops w/ switching			

FCC Form 525  
High Cost Mechanism  
Competitive Carrier Line Count Report

FCC Form 525  
OMB Control No. 3060-0986  
June 2005

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

<b>Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier</b>			
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.			
Name of Reporting Carrier: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.			
Service Provider Identification Number: 143028094			
Signature of authorized officer or employee:			Date:
Printed name of authorized officer or employee: Charles Freese			
Title or position of authorized officer or employee: Secretary, Board of Directors			
Telephone number of authorized officer or employee: ( 563 ) 374 - 1236 ext.			
Study Area Code of Reporting CETC	359007	Filing Due Date for this form (mm/dd/yyyy)	6/30/2010
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.			

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING FCC FORM 525 ON THE CARRIER'S BEHALF:

Certification of Officer or Employee to Authorize an Agent to File FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier			
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on FCC Form 525 on behalf of the reporting carrier. I also certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data provided to the authorized agent; and, to the best of my knowledge, the actual line count data provided to the authorized agent is accurate.</p>			
Name of Authorized Agent: _____			
Name of Reporting Carrier: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.			
Service Provider Identification Number:		143028094	
Signature of authorized officer or employee:		Date:	
Printed name of authorized officer or employee:			
Title or position of authorized officer or employee:			
Telephone number of authorized officer or employee: ( ) - ext.			
Study Area Code of Reporting CETC	359007	Filing Due Date for this form (mm/dd/yyyy)	
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>			

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier			
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the information reported on FCC Form 525 on behalf of the reporting carrier; I have provided the line count data reported herein based on actual line count data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. I also certify that I will provide copies of the line count filing to the reporting carrier within 15 days.</p>			
Name of Reporting Carrier: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.			
Name of Authorized Agent: _____			
Signature of authorized agent or employee of agent:		Date:	
Printed name of authorized agent or employee of agent:			
Title or position of authorized agent or employee of agent:			
Telephone number of authorized agent: ( ) - ext.			
Study Area Code of Reporting CETC	359007	Filing Due Date for this form (mm/dd/yyyy)	
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>			

FCC Form 525  
High Cost Support Mechanism  
Competitive Carrier Line Count Form

FCC Form 525  
OMB Control No. 3060-0986  
June 2005

NOTICE: Sections 54.307(b) and 54.802(a) of the Federal Communications Commission's rules requires all competitive eligible telecommunications carriers to provide line count information to USAC, the universal service Administrator, in order to be eligible to receive support. Pursuant to Sections 54.307(c) and 54.802(a), this information must be submitted by support mechanism on a quarterly basis in accordance with the incumbent carrier's line count reporting schedule. This collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. §254. The data in the form will be used to calculate the amount of support, if any, that each reporting carrier is eligible to receive from the High Cost support mechanisms.

We have estimated that each response to this collection of information will take, on average, 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Washington, D.C. 20554, Paperwork Reduction Project (3060-0986). We also will accept your comments via the Internet if you send them to [Judith-B.Herman@fcc.gov](mailto:Judith-B.Herman@fcc.gov). Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember -- You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0986.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information that you provide to determine High Cost support amounts for competitive eligible telecommunications carriers. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your form may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order. In certain cases, the information in your form may be disclosed to the Department of Justice, court, or other adjudicative body when (a) the Commission; (b) any employee of the Commission; or (c) the United States government, is a party to a proceeding before the body or has an interest in the proceeding.

If you do not provide the information we request on this form, you are not eligible to receive support under the High Cost support mechanisms, 47.C.F.R. §§ 54.307 and 54.802.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. § 3501, et seq.

FCC Form 525  
High Cost Mechanism  
Competitive Carrier Line Count Report

FCC Form 525  
OMB Control No. 3060-0986  
June 2005

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

<b>Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier</b>			
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.			
Name of Reporting Carrier: F&B Communications, Inc. f/k/a Farmers' and BusinessMen's Tel. Co.			
Service Provider Identification Number: 143028094			
Signature of authorized officer or employee: <i>Charles Freese</i>			Date: 7-13-10
Printed name of authorized officer or employee: Charles Freese			
Title or position of authorized officer or employee: Secretary, Board of Directors			
Telephone number of authorized officer or employee: ( 563 ) 374 - 1236 ext.			
Study Area Code of Reporting CETC	359007	Filing Due Date for this form (mm/dd/yyyy)	6/30/2010
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.			



103 Main Street North  
P.O. Box 309  
Wheatland, IA 52777

Phone: 563-374-1236  
Fax: 563-374-1930

July 13, 2010

Alex Wolff  
Assistant Program Manager of High Cost  
Universal Service Administrative Company  
2000 L Street, N.W., Suite 200  
Washington, D.C. 20036

RE: 359007 2<sup>nd</sup> Qtr, June 30, 2010 IAS Filing

Dear Mr. Wolff,

F&B Communications, Inc. accidentally missed our June 30<sup>th</sup> IAS filing. F&B is a small rural Iowa company with very limited resources which some times makes it difficult to meet the filing deadlines, however we have in the past.

Unfortunately between vacations, USDA/RUS meetings and end of quarter chaos my office manager and I failed to make the required IAS filing and only later realized the filing was past due. I know that there are rules we all must follow and good reasons for them, one being that USAC has a job to do and cannot complete its work in a timely manner or get disbursements out without data being filed in a timely manner.

F&B gives our customers a one-time forgiveness each year for a late payment on their account. I plead with you that USAC would find mercy upon F&B and also give us a one-time forgiveness. You can clearly see from our USAC records that F&B has never been late filing any of our reports be it ICLS, IAS or certifications in the past. Needless to say every dollar F&B receives is extremely important to our company as a small rural carrier. Thank you for your time and consideration.

Sincerely,

Kenneth Laursen  
General Manager